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1	JONATHAN R. BASS (State Bar No. 75779)			
	CHARMAINE G. YU (State Bar No. 220579)			
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6				
	Attorneys for ALCO IRON & METAL CO.			
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R				

# UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA

PICK-N-PULL AUTO DISMANTLERS, a California general partnership,

Plaintiff,

v.

ALCO IRON & METAL CO., a California corporation; CESAR ZAMORA, an individual; RICARDO ZAMORA, an individual; EMILIO ZAMORA, an individual; and DOES 1-25,

Defendants.

Case No. 3:14-CV-03275 VC

STIPULATION AND [PROPOSED]
ORDER ENLARGING TIME FOR
DISCOVERY CONFERENCE AND
INITIAL DISCLOSURES, AND INITIAL
CASE MANAGEMENT CONFERENCE
PURSUANT TO LOCAL RULE 6-2

Judge: Hon. Vince Chhabria Trial Date: None Set

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WHEREAS Plaintiff Pick-N-Pull Auto Dismantlers ("Plaintiff") and Defendants Alco Iron
& Metal Co., Cesar Zamora, Ricardo Zamora, and Emilio Zamora (together, "Defendants," and
collectively with Plaintiff, the "Parties") previously stipulated to one prior extension of time,
whereby Defendants' time to answer or otherwise respond to the Complaint was extended to and
including September 22, 2014 [Dkt. 14];

WHEREAS that extension of time did not alter the date of any event or deadline currently fixed by Court order;

WHEREAS the Parties are scheduled to mediate this dispute on October 7, 2014;

WHEREAS, in light of the scheduled mediation, Plaintiff and Defendants desire to extend the dates set forth in the Court's Order Setting Initial Case Management Conference and ADR Deadlines [Dkt. 7];

IT IS HEREBY STIPULATED and agreed to, by and among the undersigned, on behalf of their respective clients, to enlarge the time regarding deadlines for the Federal Rule of Civil Procedure 26 discovery conference and initial disclosures, and the initial case management conference. The stipulated dates, and corresponding effect upon the current schedule, are as follows:

### October 21, 2014

### Last Day to:

- (1) Meet and confer re: initial disclosures, early settlement, ADS process selection, and discovery plan;
- (2) File ADR Certification signed by Parties and Counsel
- (3) File either Stipulation to ADR Process or Notice Need for ADR Phone Conference

This stipulated date represents an extension of three weeks beyond the date currently scheduled for these items.

## **November 11, 2014**

Last day to file Rule 26(f) Report, complete initial disclosures or state objection in Rule 26(f) Report and file Case Management Statement per Court's standing order re: Contents of Joint Case Management Statement

This stipulated date represents an extension of four weeks beyond the date currently scheduled for these items.

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1	November 18, 2014	Floor at 10:00 a.m.			
2	This stipulated date represents an extension of four weeks beyond the date currently				
3	scheduled for the conference.  IT IS SO STIPULATED AND AGREED.				
4					
5					
6 7	DATED: September 19, 2014	COBLENTZ PATCH DUFFY & BASS LLP			
8		By: /s/Charmaine G. Yu			
9		Charmaine G. Yu			
10		Attorneys for Attorneys for ALCO IRON & METAL CO.			
11	DATED: Contombox 10, 2014	DEDI INED COHEM			
12	DATED: September 19, 2014	BERLINER COHEN			
13		By: /s/Kathleen Sherman			
14		Kathleen Sherman			
15		Attorneys for PICK-N-PULL AUTO DISMANTLERS.			
16	DATED: September 19, 2014	THE LAW OFFICES OF ERIK BABCOCK			
17					
18		By: /s/ Erik Babcock			
19		Erik Babcock Attorneys for EMILIO ZAMORA.			
20		·			
	DATED: September 19, 2014	THE LAW OFFICES OF PAUL M. WELLENKAMP			
21					
22		By: /s/Paul M. Wellenkamp			
23		Paul M. Wellenkamp Attorneys for CESAR ZAMORA.			
24		·			
25	DATED: September 19, 2014	BONJOUR, THORMAN, BARAY & BILLINGSLEY			
26					
27		By: /s/Michael Thorman			
28		Michael Thorman Attorneys for RICARDO ZAMORA.			
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		N AND [PROPOSED] ORDER ENLARGING TIME			

I, Charmaine G. Yu, attest that concurrence in the filing of this STIPULATION ANI
[PROPOSED] ORDER ENLARGING TIME FOR DISCOVERY CONFERENCE AND
INITIAL DISCLOSURES, AND INITIAL CASE MANAGEMENT CONFERENCE
PURSUANT TO LOCAL RULE 6-2 has been obtained from each of the other signatories.

Executed this 19th day of September, 2014, at San Francisco, California.

/s/Charmaine G. Yu Charmaine G. Yu

